REMARKS

Claims 1-64 are pending in the application.

Claims 1-4, 6, 16-19, 21, 31, 35, 38-40, and 42 have been amended. These amendments have been made for clarification purposes only. The amendments do not narrow the scope of the claims and are not necessary to overcome the outstanding rejections.

Claims 52-64 have been added. Support for these claims can be found, at least, on pages 8-10 and in existing claims 1-51.

Claims 1-5, 16-20 and 31-41 stand rejected.

Claims 6-15, 21-30 and 42-51 are objected to.

Rejection of Claims under 35 U.S.C. § 102

Claims 1-5, 16-20 and 31-41 stand rejected under 35 U.S.C. § 102(b), as being anticipated by Wilford, et al., U.S. Patent No. 5,509,006. Applicants respectfully assert that these claims are patentable over the cited art for at least the reasons set forth in the remarks that accompany the Request for Continued Examination mailed on November 30, 2004.

Nevertheless, in an attempt to expedite prosecution, Applicants have amended claim 1 to expand the phrase "a Balanced Hash Table of Access Control List Binary Comparison Trees" to "a Hash Table, wherein the Hash Table is balanced, the Hash Table is configured to store Binary Comparison Trees, and the Hash Table is configured to encode an Access Control List." This amended language simply restates the features of the "Balanced Hash Table of Access Control List Binary Comparison Trees" in a manner that allows each separate feature to be parsed separately.

The cited art fails to anticipate, teach, or suggest the "hash table" of claim 1. In particular, no portion of Wilford has been cited as teaching a "hash table." The Examiner states that tree memory 308 of Wilford anticipates a "Hash Table of Access Control List Binary Comparison Trees" because "tree memory 308 [has] routing tables or access control list converted (encoded) and stored in it for using in routing determination of a received packet." Office Action, pages 5-6. However, this explanation does not address the issue of whether tree memory 308 is a "hash table." Later, the Examiner states that "the access control list depicted in

Fig. 7C and disclosed at col. 16, line 26 and thereinafter and routing table converting into subtrees in the tree memory corresponding to the disputed term 'hash table.'" Office Action, p. 7. However, the cited portion of Wilford merely states "active access control lists may be converted by the high-level processor 208 from the high-level memory 209 into the tree memory 308 similarly to routing tables." Wilford, col. 16, lines 46-49. This clearly neither teaches nor suggests a hash table, as recited in claim 1. Accordingly, for at least this reason, the cited art fails to anticipate, teach, or suggest claim 1. Claims 2-63 are patentable over the cited art for similar reasons.

Furthermore, the cited art fails to teach or suggest a hash table that is balanced, as recited in claim 1. The Examiner cites the "weighted tree representation 804" of Wilford as teaching a "balanced hash table." Office Action, p. 7. Wilford states:

> "As host addresses for each protocol type are parsed and recognized, the high-level processor 208 may add them to the routing table 802 using a weighted tree representation 804. The high-level processor 208 may generate a weighted tree 804 of addresses, weighted by usage so that a minimal number of comparisons may generally be needed to recognize each address." Wilford, col. 17, lines 61-67.

Thus, Wilford describes a weighted tree that includes addresses, not a balanced hash table that stores binary comparison trees. Among other things, a tree is not a hash table, nor can a tree of addresses be equated with a hash table of binary comparison trees. Accordingly, the cited portions of Wilford clearly neither teach nor suggest this feature of claim 1.

Furthermore, Applicants note that the Office Action appears to be equating the features of Applicants' claims with simply "parsing a received packet against an access control list." In particular, the Office Action states that "parsing a received packet against an access control list is not new or novel. Most of routers or firewalls hardware or software do it. Wilford, as clearly pointed out in the Office Action and above, discloses just that." Office Action, p. 6. However, claim 1 does not simply recite "parsing a received packet against an access control list." Any attempt to interpret claim 1 in that manner impermissibly ignores much of the language of the claim, which among other things recites a hash table that is balanced, stores binary comparison trees, and encodes an access control list. "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re* Wilson, 424 F.2d 1382, 165 USPQ 494, 496 (C.C.P.A. 1970) (emphasis added). Thus, ignoring any of the language of claim 1 is
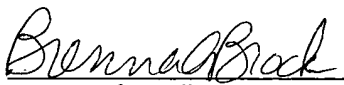
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improper. Furthermore, simply stating that a reference teaches "parsing a received packet against an access control list" clearly neither teaches nor suggests claim 1.

Allowable Subject Matter

Applicants assert that claims 6-15, 21-30, and 42-51 depend from patentable base claims. Claims 6-15, 21-30, and 42-51 were objected to as being dependent upon a rejected base claim, but indicated as being allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants thank the Examiner for the thoughtful consideration of these claims. Applicants will rewrite these claims in independent form at a later date, if necessary.

CONCLUSION

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5087.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on **June 7, 2005.**

_____   6-7-2005
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